

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ESCAPEX IP LLC,	§
	§
Plaintiff,	§
	§
	§
v.	Civil Action No. 6:22-cv-00427
	§
APPLE INC.,	§
	§
	§
Defendant.	JURY TRIAL DEMANDED
	§
	§

**DECLARATION OF BETTY CHEN IN SUPPORT OF DEFENDANT APPLE INC.’S  
MOTION TO DISMISS GIVEN ESCAPEX’S ADMISSION THAT “APPLE DOES NOT  
INFRINGEMENT”**

I, Betty Chen, declare as follows:

1. I am an attorney at the firm of Fish & Richardson P.C., counsel of record in this action for Defendant, Apple Inc. (“Apple”). I make this declaration in support of Apple Inc’s Motion to Dismiss Given EscapeX’s Admission That “Apple Does Not Infringe.” I am a member of the Bar of the State of Texas and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached hereto are true and correct copies of the following documents:

<b>Exhibit #</b>	<b>Description of Exhibit</b>
1	Email from EscapeX counsel to Apple counsel dated July 21, 2022
2	Email from Apple Counsel to EscapeX counsel dated August 27, 2022
3	Letter from Apple counsel to EscapeX counsel dated June 1, 2022
4	Chart attached to June 21, 2022 Email from EscapeX counsel to Apple counsel
5	Letter from Apple counsel to EscapeX counsel dated July 27, 2022

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 9th day of September, 2022.

*/s/ Betty Chen*

Betty Chen

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically on September 9, 2022. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system.

*/s/ Betty Chen*

Betty Chen